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2016 MAR 16 PM 3:21  
IDAHO PUBLIC  
UTILITIES COMMISSION

Attorney for the Idaho Conservation League

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE )  
APPLICATION OF ROCKY MOUNTAIN )  
POWER FOR AUTHORITY TO )  
INCREASE SCHEDULES 191 – )  
CUSTOEMR EFFICIENCY SERVICES )  
RATE )

CASE NO. PAC-E-16-02  
COMMENTS OF THE IDAHO  
CONSERVATION LEAGUE

The Idaho Conservation League (ICL) supports Rocky Mountain Power's request to increase Schedule 191 Customer Efficiency Services Rate. ICL acknowledges any rate increase could negatively impact customers. Energy efficiency services are somewhat unique however. First, the Commission retains full authority to review all spending of customer efficiency funds to ensure the utility invested said funds prudently. This annual prudence determination ensures all customers benefit from funding efficiency programs. Second, to the extent a customer participates in efficiency programs, they can reduce their energy demand and likely their energy bill. Because of these unique features of utility efficiency funding protect customers when the utility subsequently invests in efficiency measures, ICL recommends the Commission approve Rocky Mountain Power's request.

ICL also support's Rocky Mountain Power's request because of the utility's recent track record of efficiency gains. Rocky Mountain continues to streamline program administration and develop new methods to engage customers. The utility programs appear to be delivering cost-effective savings. The utility IRP reveals that expanding energy savings going forward is the least cost, least risk strategy. Because Rocky Mountain Power has a track record of improving

programs with expanding participation, ICL supports the utility request to increase funding for efficiency services.

Respectfully submitted,



Benjamin J. Otto  
Idaho Conservation League

### CERTIFICATE OF SERVICE

I certify that on the 16th day of March 2016, I delivered true and correct copies of the foregoing COMMENTS to the following persons via the method noted:

Hand delivery:

Jean Jewell  
Commission Secretary (Original and 7  
copies)  
Idaho Public Utilities Commission  
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